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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

In re:)	
)	Chapter 11
RETAIL GROUP, INC., <i>et al.</i> , ¹)	
)	Case No. 20-33113 (KRH)
Reorganized Debtors.)	(Jointly Administered)
)	

**CERTIFICATION OF NO OBJECTION REGARDING THE PLAN
ADMINISTRATOR'S THIRTY-FIRST OMNIBUS OBJECTION TO CLAIMS
(NO LIABILITY LEASE CLAIMS AND PARTIALLY SATISFIED LEASE CLAIMS)**

The undersigned hereby certifies as follows:

On July 27, 2021, Jackson Square Advisors LLC, in its capacity as the plan administrator of the above-captioned reorganized debtors (the "Plan Administrator") filed *The Plan Administrator's Thirty-First Omnibus Objection to Claims (No Liability Lease Claims and Partially Satisfied Lease Claims)* [Docket No. 2333] (the "Objection") with the United States Bankruptcy Court for the Eastern District of Virginia (the "Court").

On July 27, 2021, the Plan Administrator filed the *Notice of the Plan Administrator's Thirty-First Omnibus Objection to Claims* (the "Notice") [Docket No. 2338] with the Court and caused the Objection and Notice to be served on all necessary parties.

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors' claims and noticing agent at <http://cases.primeclerk.com/ascena>. The location of Reorganized Debtor Mahwah Bergen Retail Group, Inc.'s principal place of business and the Reorganized Debtors' service address in these chapter 11 cases is 933 MacArthur Boulevard, Mahwah, New Jersey 07430.

Pursuant to the procedures set forth in the *Order (I) Establishing Certain Notice, Case Management and Administrative Procedures, and (II) Granting Related Relief* [Docket No. 79] and the Notice, any pleadings responsive to the Objection had to be filed and served no later than August 17, 2021 (the “Response Deadline”). In the absence of any timely responses, the Plan Administrator may submit a proposed order to the Court granting the relief requested without further notice or a hearing.

The Plan Administrator received several informal responses from certain claimants whose claims are subject to the Objection. The Plan Administrator is working to resolve these responses with the claimants and has excluded the unresolved claims from the revised proposed order sustaining the Objection [Docket No. 2408]. Upon resolution of the unresolved claims, the Plan Administrator will file supplemental order(s) with respect to the Objection, as applicable.

[Remainder of page intentionally left blank]

Other than the aforementioned responses, the undersigned is not aware of any responsive pleadings concerning the Objection. Accordingly, an order sustaining the Objection shall be submitted to the Court for entry.

Dated: September 3, 2021

/s/ Olya Antle

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